

EXHIBIT 65

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~

IN RE NATIONAL PRESCRIPTION OPIATE
LITIGATION

MDL No. 2804

Case No. 17-md-2804

This document relates to: **Judge Dan**
Aaron Polster

The County of Cuyahoga v. Purdue
Pharma L.P., et al.

Case No. 17-OP-45005

Videotaped Deposition of
TREVOR McALEER

January 10, 2019

9:06 a.m.

~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~

图 7-1-5-20

Climaco, Wilcox, Peca & Garofoli
55 Public Square, Suite 1950
Cleveland, Ohio

<p style="text-align: right;">Page 82</p> <p>1 Q. Do you know if there was or if there has 2 been another chairperson of the HR committee in your 3 time as the legislative budget adviser?</p> <p>4 A. Yes.</p> <p>5 Q. And who was that chairperson?</p> <p>6 A. Councilwoman Yvonne Conwell.</p> <p>7 Q. And do you attend the HR committee 8 meetings where these appointments are presented to 9 the committee?</p> <p>10 A. Yes.</p> <p>11 Q. And what happens or can you walk me 12 through the process of a hearing before the HR 13 committee?</p> <p>14 A. Yes.</p> <p>15 Q. Would you please do that.</p> <p>16 A. Yes. The entire process includes the 17 county executive will nominate an individual to a 18 board. That then gets drafted into legislation, a 19 resolution, that will be given to our clerk of 20 council. Our clerk of council then will put that 21 resolution on a Council agenda, a full Council 22 agenda.</p> <p>23 That resolution then gets referred to a 24 committee, which in this case is the HR committee. 25 Then the HR committee will meet and have as many</p>	<p style="text-align: right;">Page 84</p> <p>1 in the nomination process that you just described?</p> <p>2 A. Occasionally, yes.</p> <p>3 Q. And what are those responsibilities?</p> <p>4 A. I may have to speak at the HR committee 5 meeting to answer a question by the committee, one 6 of the committee members.</p> <p>7 Q. What types of questions does the council 8 ask of you during these hearings?</p> <p>9 A. They tend to be high-level. It's not 10 necessarily about the appointee but more about, say, 11 a term, if it's a term, when did it become vacant, 12 how many other seats might be vacant, things of that 13 nature.</p> <p>14 Q. So you're not being asked to provide a 15 recommendation one way or the other on whether a 16 nominee should be approved by the Council; is that 17 right?</p> <p>18 A. Not on executive-recommended appointments.</p> <p>19 Q. Okay. On non-executive-recommended 20 appointments, is your role different? Do you -- is 21 your role different?</p> <p>22 A. Yes.</p> <p>23 Q. And how is your role different for 24 non-executive appointments?</p> <p>25 A. There are very few boards that Council</p>
<p style="text-align: right;">Page 83</p> <p>1 number of committee meetings that they need. And if 2 it gets -- the HR committee will then vote on to 3 refer that item back to the full council for 4 consideration of the item.</p> <p>5 Q. And then when it gets to council, is there 6 another hearing?</p> <p>7 A. There is a committee -- I'm sorry, a 8 council meeting where then the full council would 9 take action on that particular item.</p> <p>10 Q. And does the nominee for whichever board 11 is currently being considered, does that person 12 usually appear before the full council for an 13 additional hearing?</p> <p>14 A. No, just at the HR committee typically.</p> <p>15 Q. Right. There are going to be differences, 16 but in general that's the way it works?</p> <p>17 A. Correct.</p> <p>18 Q. And is the process you just described the 19 way that the council has operated since you started 20 as a legislative budget adviser in the summer of 21 2011?</p> <p>22 A. Yes.</p> <p>23 Q. And throughout this process, aside from 24 sometimes drafting the resolution for the 25 appointments, do you have any other responsibilities</p>	<p style="text-align: right;">Page 85</p> <p>1 directly appoints versus confirming to certain 2 boards, and I will handle that process along with 3 co-workers of coming up with a recommendation to 4 council members.</p> <p>5 Q. And which boards exist for the County for 6 which the County Council appoints members as opposed 7 to approving or confirming executive 8 recommendations?</p> <p>9 A. I don't have an exhaustive list, but one 10 is the Soldiers and Sailors Monument.</p> <p>11 Q. Can you think of any other examples?</p> <p>12 A. No.</p> <p>13 Q. Have you in your time as legislative 14 budget adviser participated in communications with 15 members of the County Council regarding specific 16 appointees to the ADAMHS Board?</p> <p>17 MS. SACKS: Objection.</p> <p>18 THE WITNESS: Can you ask that one more 19 time, please.</p> <p>20 BY MR. MOONEY:</p> <p>21 Q. Maybe. In your time as the legislative 22 budget adviser, have you been a part of any 23 conversations with members of the County Council 24 regarding appointments to the ADAMHS Board?</p> <p>25 MS. SACKS: Same objection.</p>

<p style="text-align: right;">Page 86</p> <p>1 THE WITNESS: Can you clarify what you 2 mean by that question?</p> <p>3 BY MR. MOONEY:</p> <p>4 Q. Sure. So if the executive nominates Jane 5 Smith to the ADAMHS Board, have you had any 6 conversations with members of Council about whether 7 Jane Smith should or should not be confirmed as a 8 member of the ADAMHS Board?</p> <p>9 A. Not should or should not.</p> <p>10 Q. Have you had other conversations about 11 specific nominees to the ADAMHS Board with members 12 of council?</p> <p>13 MS. SACKS: Objection.</p> <p>14 THE WITNESS: Yes.</p> <p>15 BY MR. MOONEY:</p> <p>16 Q. What kinds of conversations have you had 17 about nominees to the ADAMHS Board with members of 18 the County Council?</p> <p>19 A. It could be questions around, if it's a 20 reappointment for a particular individual, when was 21 this person first appointed; does this person 22 still -- I mean, is the person still working at X 23 place just to see if that person's resumé is still 24 up to date or things of that nature to get a 25 background on that individual person.</p>	<p style="text-align: right;">Page 88</p> <p>1 A. Yes.</p> <p>2 Q. Have you had any conversations with 3 members of County Council about how they make that 4 determination of whether or not to vote to approve a 5 member or a nominee for the ADAMHS Board?</p> <p>6 MS. SACKS: Objection.</p> <p>7 THE WITNESS: I don't remember.</p> <p>8 BY MR. MOONEY:</p> <p>9 Q. If I wanted to know why a council member 10 voted to approve an executive nominee to the ADAMHS 11 Board, who would I speak to if you don't know?</p> <p>12 MS. SACKS: Objection.</p> <p>13 THE WITNESS: I don't know who you would 14 speak to.</p> <p>15 BY MR. MOONEY:</p> <p>16 Q. Would Mr. Nanni know, the chief of staff?</p> <p>17 Yeah, would Mr. Nanni know?</p> <p>18 A. I don't know.</p> <p>19 MS. SACKS: Objection.</p> <p>20 BY MR. MOONEY:</p> <p>21 Q. Is there a member of the County Council 22 staff with responsibility for assisting the council 23 members with the nomination process, that is their 24 overall responsibility as opposed to that's just 25 part of yours?</p>
<p style="text-align: right;">Page 87</p> <p>1 Q. Do you know why members of Council vote to 2 approve particular members of the ADAMHS Board?</p> <p>3 MS. SACKS: Objection.</p> <p>4 THE WITNESS: I don't know.</p> <p>5 BY MR. MOONEY:</p> <p>6 Q. Do you know what considerations go into 7 members of Council's evaluation of whether or not an 8 appointee should or should not be approved as a 9 member of the ADAMHS Board?</p> <p>10 A. I don't know.</p> <p>11 Q. Have you had any conversations with 12 members of Council about the criteria that they 13 apply when evaluating whether or not to approve a 14 nominee for a position as an ADAMHS Board member?</p> <p>15 A. Can you ask that --</p> <p>16 Q. I can try.</p> <p>17 Have you had any conversations with 18 members of Council about the criteria that they 19 apply when evaluating whether or not to approve a 20 nominee to the ADAMHS Board?</p> <p>21 A. What do you mean by criteria?</p> <p>22 Q. So a nomination comes before the County 23 Council, right, and they -- and the council member 24 either says yes, this person should be appointed or 25 approved or not, right?</p>	<p style="text-align: right;">Page 89</p> <p>1 MS. SACKS: Objection.</p> <p>2 THE WITNESS: There is for the nomination 3 process.</p> <p>4 BY MR. MOONEY:</p> <p>5 Q. Okay. And who is that person?</p> <p>6 A. It's the clerk who clerks the HR 7 committee.</p> <p>8 Q. And is there a specific clerk for each of 9 the committees?</p> <p>10 A. There is.</p> <p>11 Q. Okay. Do you have any role in drafting 12 budget resolutions?</p> <p>13 A. Not original budget resolutions, not the 14 introduced budget resolutions.</p> <p>15 Q. Okay. So it sounds like you're making a 16 distinction between the original budget resolution 17 and then something else.</p> <p>18 Is there a something else?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. What is -- what is that something 21 else that you do have responsibility for?</p> <p>22 A. It would be budget amendments to a 23 proposed budget resolution.</p> <p>24 Q. Let's start with the budget resolution 25 itself, the original one.</p>

<p>1 Who has responsibility for drafting that 2 resolution?</p> <p>3 A. I don't know who drafts the budget, the 4 original budget resolution.</p> <p>5 Q. Is there a particular department in the 6 executive's office that drafts the resolution?</p> <p>7 A. There's -- there's a particular department 8 that's in charge of creating the contents of the 9 resolution. I don't know who drafts it.</p> <p>10 Q. Okay. And who is the department in charge 11 of creating the contents of the resolution?</p> <p>12 A. Office of Budget and Management.</p> <p>13 Q. And so OBM puts together the contents of a 14 resolution, someone creates the resolution itself, 15 and then it goes to the County Council; is that 16 right?</p> <p>17 A. It eventually comes to the County Council.</p> <p>18 Q. Okay. And then there's a budget 19 amendment. There's a budget amendment.</p> <p>20 What's that?</p> <p>21 A. So if there is the budget resolution 22 that's introduced to the County Council, the County 23 Council goes through the budget process, which can 24 take up to anywhere between three months, up to 25 three months; and council members have in the past</p>	Page 90	<p>1 apprised of the budget process.</p> <p>2 What does that responsibility entail?</p> <p>3 A. So that includes ensuring that they have 4 all the necessary information that we receive from 5 the various directors, departments, and any other 6 additional information that OBM might need to submit 7 as supplemental material to the proposed budget 8 resolution and ensuring that council members are 9 receiving that information.</p> <p>10 Q. And so is it your role to sort of 11 interface between the County Council and the 12 executive's administration on matters relating to 13 the budget?</p> <p>14 A. Yes.</p> <p>15 Q. Other than ensuring that the County 16 Council has the information they need, are there 17 other responsibilities that you have as the 18 legislative budget adviser that sort of fall under 19 the umbrella of keeping the Council apprised of the 20 budget?</p> <p>21 A. Could you clarify that, what you mean by 22 that?</p> <p>23 Q. Sure. I can try.</p> <p>24 So after the budget is passed, do you have 25 any role in keeping the Council apprised of how the</p>	Page 92
<p>1 amended the proposed budget.</p> <p>2 Q. And then so if a council member wants to 3 amend the proposed budget, it would come to you to 4 draft the amendment?</p> <p>5 A. Yes.</p> <p>6 Q. And is that amendment a separate 7 resolution or something else?</p> <p>8 A. It could be -- it could be.</p> <p>9 Q. So it could be a separate resolution. And 10 is the alternative that you would just enter into 11 the Word document and change a number?</p> <p>12 A. No.</p> <p>13 Q. So what's the other way that there could 14 be an amendment if not as a separate resolution?</p> <p>15 A. It could be an Excel spreadsheet with the 16 proposed amendments that then the council would take 17 action on those proposed amendments. It could be a 18 writeup spelling out what the amendment would be, 19 and they could adopt those amendments that way.</p> <p>20 Q. And for each of these options for the 21 amendment, it would be your responsibility to create 22 that document; is that right?</p> <p>23 A. Yes.</p> <p>24 Q. You also mentioned that your 25 responsibilities include keeping the County Council</p>	Page 91	<p>1 executive is performing in relation to the approved 2 budget?</p> <p>3 MS. SACKS: Objection.</p> <p>4 THE WITNESS: I don't know what you mean 5 by "how the executive is performing."</p> <p>6 BY MR. MOONEY:</p> <p>7 Q. So the ADAMHS Board, I'm just using them 8 as an example, the ADAMHS Board gets \$100,000, and 9 they're supposed to be spending \$50,000 on 10 personnel.</p> <p>11 Is it your responsibility to keep the 12 council members apprised of whether or not the 13 ADAMHS Board is spending money consistent with the 14 money that was allocated in the budget or if they've 15 gone over, they're actually going to spend \$55,000 16 on personnel? Is that within your wheelhouse as the 17 legislative budget adviser?</p> <p>18 A. There I think is a little misunderstanding 19 on how the ADAMHS Board in particular is funding 20 versus other agencies.</p> <p>21 Q. Okay. Pick a different one that's sort of 22 more in line.</p> <p>23 A. So like an executive -- administrative 24 department of development.</p> <p>25 Q. Sure, great.</p>	Page 93

<p style="text-align: right;">Page 94</p> <p>1 A. We get monthly projections from the Office 2 of Budget and Management on how they are performing. 3 Q. And when you say "we," who do you mean by 4 that? 5 A. Typically it will come to me, and 6 sometimes council members are on it. I will make 7 sure council members have it from there if they're 8 not on the notification. 9 Q. Okay. And so once you've ensured that the 10 council members have the monthly reports from the 11 administrative agencies, do you communicate with the 12 council members about those documents at all? 13 A. Sometimes, yes. 14 Q. Okay. And what kinds of conversations do 15 you have with the members of Council about those 16 monthly budget reports? 17 A. It could vary from month to quarter in 18 terms of if something sticks out from the report, 19 just things that I want to make sure is on the 20 council members' radar. 21 Q. So is it correct that you review the 22 reports to look for things that stick out? 23 MS. SACKS: Objection. 24 THE WITNESS: The monthly -- the monthly 25 reports.</p>	<p style="text-align: right;">Page 96</p> <p>1 Q. You mentioned earlier that members will 2 come to you or other members of the council staff 3 with policy ideas; is that correct? 4 A. Yes. 5 Q. And they'll sometimes ask that the staff 6 implement or draft legislation to implement those 7 policy ideas? 8 A. Yes. 9 Q. In your time as the legislative budget 10 adviser, has any member of the County Council come 11 to you and asked for your assistance in drafting 12 legislation to respond to prescription opioid abuse 13 in Cuyahoga County? 14 MS. SACKS: Objection. 15 THE WITNESS: Can you ask that -- can you 16 rephrase that question, please? 17 BY MR. MOONEY: 18 Q. Was there a particular part of the 19 question that you found confusing? 20 A. Because when I was talking about a policy 21 getting drafted to legislation, I was referring to 22 codified ordinances, and I don't believe that's what 23 you're asking. I don't believe that's what you're 24 seeking. 25 Q. So okay. Are there any codified</p>
<p style="text-align: right;">Page 95</p> <p>1 BY MR. MOONEY: 2 Q. Okay. 3 A. Or quarterly reports. 4 Q. And what do you mean by things that stick 5 out in those monthly or quarterly reports? 6 A. An example of that could be if our sales 7 tax revenue is down 3 percent from what was 8 originally projected, that's a significant variance, 9 is that going to be a trend or is that going to -- 10 is this a one-time problem, things like that. 11 Q. So do you in your role as the legislative 12 budget adviser work to create sort of trend reports 13 that show the changes in sales tax over time? 14 A. I track sales tax. I don't create. I 15 don't create the reports that are sent to us. 16 Q. Okay. And so if there were a report that 17 tracked historical sales tax revenue, that would 18 come from OBM? 19 A. Historical sales tax, yes. I personally 20 also as my duty keep track of monthly sales tax 21 reports dating back for years. 22 Q. But you don't create a separate document? 23 A. I do not. 24 Q. You just keep eyeballing it? 25 A. Yes.</p>	<p style="text-align: right;">Page 97</p> <p>1 ordinances that you're aware of that were enacted by 2 the County Council that relate to prescription 3 opioid abuse? 4 A. Not codified ordinances. 5 Q. Are there resolutions that relate to 6 prescription opioid abuse in Cuyahoga County that 7 the County Council has enacted? 8 A. There have been budget amendments to 9 budgets related to the issue. 10 Q. And when you say "related to the issue," 11 what do you mean by that? 12 A. The ADAMHS Board as well as other 13 departments have come to the County Council and have 14 talked to us about increased areas where they're 15 seeing that they would request additional resources 16 to help combat the issue. 17 Q. And when you say "the issue," what do you 18 mean by that? 19 A. They would talk about the -- they would 20 use the terms "opiate crisis," "the prescription 21 drug issue." They are the ones coming to us asking 22 us for resources based on that. 23 Q. When these departments or ADAMHS Board 24 have come and asked for additional resources to 25 combat the issue, have they also described the issue</p>

<p>1 as one involving heroin abuse?</p> <p>2 MS. SACKS: Objection.</p> <p>3 THE WITNESS: I don't remember.</p> <p>4 BY MR. MOONEY:</p> <p>5 Q. Has the issue that you mentioned, has that ever been described as a fentanyl issue?</p> <p>7 MS. SACKS: Objection.</p> <p>8 THE WITNESS: I don't know.</p> <p>9 BY MR. MOONEY:</p> <p>10 Q. What -- what resources have -- has the ADAMHS Board requested to respond or to combat the opiate crisis?</p> <p>13 MS. SACKS: Objection.</p> <p>14 THE WITNESS: Can you clarify what you mean by that?</p> <p>16 BY MR. MOONEY:</p> <p>17 Q. Sure. You said the budget -- the ADAMHS Board as well as other departments have come to the County Council and have talked about the increased areas where they're seeing that they would request additional resources to help combat the issue.</p> <p>22 Right?</p> <p>23 A. Yes.</p> <p>24 Q. And then I said what is the issue, and you said it's been described as an opiate crisis.</p>	<p>Page 98</p> <p>1 hearings in the fall of 2017?</p> <p>2 MS. SACKS: Objection.</p> <p>3 THE WITNESS: I don't remember.</p> <p>4 BY MR. MOONEY:</p> <p>5 Q. Okay. When was the -- what was the budget process that occurred before the fall of 2017?</p> <p>7 A. It would have been the fall of 2015 for the 2016-'17 biennial budget.</p> <p>9 Q. Okay. And did the ADAMHS Board come to the County Council asking for dollars for various programs seeking help and assistance from the County Council to increase their subsidy to respond to the opioid crisis in these fall of 2015 budget hearings?</p> <p>14 MS. SACKS: Objection.</p> <p>15 THE WITNESS: I don't know if it was during that budget hearing.</p> <p>17 BY MR. MOONEY:</p> <p>18 Q. Okay. Before the fall of 2015, when was the budget process before that?</p> <p>20 A. I don't have an exact date, but it would have -- if the biennial budget process was in place, because for a couple years we did single-year budgets, then we moved to a biennial budget process, if it was a biennial budget process, it would have been the fall of 2013.</p>
<p>1 So my question is, what resources has the ADAMHS Board requested of the County Council?</p> <p>3 A. So they have come to other -- they have come to us asking for millions of dollars for various programs seeking some help and assistance from the County Council to increase their subsidy.</p> <p>7 Q. And when did the ADAMHS Board come to the County Council asking for millions of dollars for various programs seeking some help and assistance from the County Council to increase their subsidy?</p> <p>11 A. They've come multiple times.</p> <p>12 Q. Okay.</p> <p>13 A. I don't have exact dates, but they've come multiple times.</p> <p>15 Q. Do they come as part of during the budgeting process?</p> <p>17 A. For the most part, they've come during the budget hearing process.</p> <p>19 Q. Okay. And so when was the most recent budget hearing process?</p> <p>21 A. It was the fall of 2017 for the 2018-'19 biennial budget.</p> <p>23 Q. And the ADAMHS Board asked for money to increase the services they could provide to respond to the opiate crisis at this hearing -- these</p>	<p>Page 99</p> <p>1 Q. Even if it were an annual budget process, would there have been hearings in the fall of 2013?</p> <p>3 A. Similar time frame, yes.</p> <p>4 Q. So in the fall of 2013, did members of the ADAMHS Board come before County Council asking for money to increase the services they could provide to respond to the opiate crisis?</p> <p>8 MS. SACKS: Objection.</p> <p>9 THE WITNESS: I don't remember if it was the fall of 2013.</p> <p>11 BY MR. MOONEY:</p> <p>12 Q. Okay. So what kinds of services were -- did the members of the ADAMHS Board who spoke to County Council say they wanted to provide to respond to the opiate crisis, if you know?</p> <p>16 MS. SACKS: Objection.</p> <p>17 THE WITNESS: I don't know specifically what type of services. I know that they would come asking for money.</p> <p>20 BY MR. MOONEY:</p> <p>21 Q. And as part of that process -- strike that.</p> <p>23 Understanding that you don't remember when these conversations occurred, is it your belief that the ADAMHS Board would have provided some kind of</p>

<p style="text-align: right;">Page 102</p> <p>1 information about the types of services they wanted 2 to provide to respond to the opiate crisis for which 3 they sought additional funding?</p> <p>4 A. Yes, they would provide information.</p> <p>5 Q. And when you say the ADAMHS Board was 6 requesting funding, was it funding specifically 7 related to the opiate crisis?</p> <p>8 MS. SACKS: Objection.</p> <p>9 THE WITNESS: It would be for mental 10 health services and addiction services.</p> <p>11 BY MR. MOONEY:</p> <p>12 Q. Which includes opiate addiction, right?</p> <p>13 A. I don't know for sure.</p> <p>14 Q. But it --</p> <p>15 A. I mean, it --</p> <p>16 Q. Probably?</p> <p>17 A. It was listed in their services, but I 18 couldn't tell you what type of services.</p> <p>19 Q. But there are services the ADAMHS Board 20 provides that are unrelated to opiate addiction?</p> <p>21 MS. SACKS: Objection.</p> <p>22 THE WITNESS: There are mental health 23 services and other services provided.</p> <p>24 BY MR. MOONEY:</p> <p>25 Q. And so when the ADAMHS Board asks for</p>	<p style="text-align: right;">Page 104</p> <p>1 Do you know whether in requesting 2 additional funding the ADAMHS Board distinguishes 3 between heroin abuse and prescription opioid abuse?</p> <p>4 A. I don't know.</p> <p>5 Q. All right. Turning to the department 6 directors asking for additional funding, which 7 departments have asked for additional funding of the 8 County Council to respond to the opioid issue?</p> <p>9 A. So in terms of individual departments that 10 we've heard that is putting a strain on their 11 budgets include the Department of Children and 12 Family Services with the number of kids that are in 13 county custody because they -- the child, sometimes 14 babies, have lost one of their parents or both of 15 their parents to the issue.</p> <p>16 They -- we have heard from our county 17 sheriff's department about the number of inmates 18 that are being taken into the jail custody. That 19 number of inmates has skyrocketed over the years.</p> <p>20 We have heard from our Medical Examiner's 21 Office in terms of something as simple as the 22 increased number of transportation, body 23 transportation contract that they had to increase 24 because of this.</p> <p>25 And we've heard from the MetroHealth</p>
<p style="text-align: right;">Page 103</p> <p>1 additional funding, do they -- did the members of 2 the ADAMHS Board identify how much of that 3 additional funding would go to opiate addiction as 4 opposed to some other purpose?</p> <p>5 A. I don't remember.</p> <p>6 Q. Is it your experience that when the ADAMHS 7 Board provides funding requests they would 8 distinguish between services for opiate addiction 9 versus other services the ADAMHS Board might 10 provide?</p> <p>11 A. The ADAMHS Board would lay out pretty 12 detailed what their request for additional funding 13 would be for.</p> <p>14 Q. Okay. Aside from the ADAMHS Board, which 15 other departments have come before the County 16 Council requesting additional resources to combat 17 the issue of prescription drug abuse?</p> <p>18 A. So in terms of specific requests, I can't 19 specifically pinpoint to one request, but we've 20 heard from various department directors of the type 21 of challenges and issues and increased costs that 22 they're seeing within their departments because of 23 the issue.</p> <p>24 Q. Okay. Before we go there, I want to 25 circle back on the ADAMHS Board piece.</p>	<p style="text-align: right;">Page 105</p> <p>1 Hospital just in terms of the Project DAWN and other 2 areas that they are using or that they have tried to 3 combat the issue.</p> <p>4 Those are the specific examples that I can 5 recall right now.</p> <p>6 Q. Okay. So we have Child and Family 7 Services, the sheriff's department, medical examiner 8 and MetroHealth, and then the ADAMHS Board?</p> <p>9 A. And the ADAMHS Board, yes, sir.</p> <p>10 Q. Are there any other departments sitting 11 here today that you can recall coming before the 12 County Council and requesting funding to respond to 13 the opioid issue?</p> <p>14 A. Not that I can recall specifically that 15 have come and requested money to that, but I will 16 say that all of our departments at the County are 17 impacted in some form or fashion because we only 18 have so much money. We can't print money.</p> <p>19 So if we do have to increase different 20 departments, that's got to come from somewhere.</p> <p>21 Q. So when you say that all departments are 22 impacted in some form or fashion, are you -- you're 23 referring to there's a finite pot of money that the 24 county can allocate, and if you're spending money on 25 X you can't spend it on Y; is that right?</p>

<p style="text-align: right;">Page 106</p> <p>1 A. Correct. There's only so much money.</p> <p>2 Q. Okay. Are there any other impacts that</p> <p>3 all of the departments are experiencing because of</p> <p>4 the opioid crisis?</p> <p>5 A. I will say I just thought of another</p> <p>6 department based off your question would be child</p> <p>7 support, where we have heard that the amount of</p> <p>8 money that are being collected owed due to child</p> <p>9 support has gone down because of the issue.</p> <p>10 So now that doesn't financially impact the</p> <p>11 county general fund or the Health and Human Services</p> <p>12 levy, but that impacts other people who are</p> <p>13 dependent on that type of money.</p> <p>14 So that has -- that department has been</p> <p>15 impacted as well.</p> <p>16 Q. Okay. Do you know if the County is</p> <p>17 seeking unpaid child support due to the opioid</p> <p>18 crisis as part of this lawsuit?</p> <p>19 MS. SACKS: Objection.</p> <p>20 THE WITNESS: I don't know.</p> <p>21 BY MR. MOONEY:</p> <p>22 Q. Circling back to the Child and Family</p> <p>23 Services department, let's start there, when did</p> <p>24 Child and Family Services inform the County Council</p> <p>25 that its costs were increasing because of increased</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. Do you know if anyone on the County</p> <p>2 Council has that information?</p> <p>3 A. I don't know.</p> <p>4 Q. Is there a particular committee of the</p> <p>5 County Council that has responsibility or would have</p> <p>6 heard this information from Child and Family</p> <p>7 Services?</p> <p>8 A. There is a Health and Human Services</p> <p>9 committee, but as I previously talked about, the</p> <p>10 monthly or quarterly reports, that is from a</p> <p>11 budgetary perspective. And those reports provided</p> <p>12 data of the average number of kids in custody.</p> <p>13 So that would have been included in those</p> <p>14 reports, and if you look over the years, you can see</p> <p>15 an increase.</p> <p>16 Q. Has any member of the County Council</p> <p>17 received those reports from Child and Family</p> <p>18 Services that show an increase in the number of</p> <p>19 children in custody?</p> <p>20 A. Those reports would have been initiated by</p> <p>21 the Office of Budget and Management.</p> <p>22 Q. And then provided to you?</p> <p>23 A. Yes.</p> <p>24 Q. And then you would have seen that the</p> <p>25 members of County Council received that report?</p>
<p style="text-align: right;">Page 107</p> <p>1 numbers of kids in custody because of the opioid</p> <p>2 crisis?</p> <p>3 A. I can't give you an exact date. I don't</p> <p>4 know the exact date.</p> <p>5 Q. Was it part of the 2017 budget hearing</p> <p>6 process?</p> <p>7 A. I don't know.</p> <p>8 Q. Was it part of the 2015 budget hearing</p> <p>9 process?</p> <p>10 A. I don't know.</p> <p>11 Q. Was it part of the 2013 budget hearing</p> <p>12 process?</p> <p>13 A. I don't know.</p> <p>14 Q. Okay. When the County -- when Child and</p> <p>15 Family Services informed the County Council that it</p> <p>16 was seeing an increase in the number of kids who</p> <p>17 were in custody due to the opioid crisis, did the</p> <p>18 individuals who provided that information</p> <p>19 distinguish between overdoses of prescription</p> <p>20 opioids and overdoses of heroin?</p> <p>21 A. I don't know.</p> <p>22 Q. Do you know, do you know what percentage</p> <p>23 of children are in child custody now because of</p> <p>24 issues related to prescription opioid abuse?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 109</p> <p>1 A. Yes.</p> <p>2 Q. Has any member of County Council after</p> <p>3 they received the report come back to you and asked</p> <p>4 any questions about the report?</p> <p>5 MS. SACKS: Objection.</p> <p>6 THE WITNESS: Any questions about the</p> <p>7 report? Is that what you're asking?</p> <p>8 BY MR. MOONEY:</p> <p>9 Q. About the reasons for the increase in the</p> <p>10 number of children in custody.</p> <p>11 A. I don't know about the reasons.</p> <p>12 Q. Okay.</p> <p>13 A. We've talked about the number of kids in</p> <p>14 custody and what that does to, say, overtime and</p> <p>15 things of that nature but not the specific reasons.</p> <p>16 Q. Okay. Are there any other costs that the</p> <p>17 Child and Family Services department has informed</p> <p>18 you or members of Council that have increased</p> <p>19 because of the opioid crisis in Cuyahoga County?</p> <p>20 A. Except for the overtime, I mean --</p> <p>21 Q. So the overtime and the number of children</p> <p>22 in custody have increased the costs to Child and</p> <p>23 Family Services?</p> <p>24 A. I don't recall any other.</p> <p>25 Q. Okay. And when the information -- when --</p>

<p style="text-align: right;">Page 110</p> <p>1 do you have an understanding of how much of that 2 overtime increase is due to prescription opioid 3 abuse as compared to heroin abuse?</p> <p>4 A. I don't know.</p> <p>5 Q. When Child and Family Services asked for 6 additional funding to respond to the opioid issues 7 the County faces, did the County Council approve 8 that funding?</p> <p>9 MS. SACKS: Objection.</p> <p>10 THE WITNESS: It wasn't -- just going back 11 to the process where the administration provides a 12 recommended budget. There have been times 13 throughout the budget process where County Council 14 has during the budget hearings increased DCFS's 15 budget.</p> <p>16 BY MR. MOONEY:</p> <p>17 Q. Okay. Above what the executive's 18 recommended budget was?</p> <p>19 A. Yes.</p> <p>20 Q. And the reason -- and did the members of 21 the County Council explain why they were increasing 22 the Child and Family Services budget above what was 23 requested from the county executive?</p> <p>24 A. One particular example is increase -- they 25 increased the number of social workers because the</p>	<p style="text-align: right;">Page 112</p> <p>1 amount that CFS would receive?</p> <p>2 A. I don't have that number.</p> <p>3 Q. You mentioned that the sheriff's 4 department has asked for additional funding of the 5 County Council because of the number of inmates that 6 have -- in custody that have I believe you used the 7 word "skyrocketed" over the years; is that right?</p> <p>8 A. That is correct.</p> <p>9 Q. Okay. And when you say the number of 10 inmates in custody has skyrocketed, that's because 11 of prescription opioid abuse?</p> <p>12 A. I don't know.</p> <p>13 Q. Okay. It's just that there are more 14 people going to jail now than there were at some 15 point in the past?</p> <p>16 A. There are more inmates in custody at the 17 Cuyahoga County Sheriff's Office.</p> <p>18 Q. And when did the sheriff's department 19 inform the Cuyahoga County Council that it needed 20 additional funding to respond to the increase in the 21 number of inmates in custody?</p> <p>22 A. Similar to DCFS, typically on the monthly 23 or quarterly OBM reports that we receive, it also 24 tracks the average daily population over time. And 25 it's been an increasing issue with the number of</p>
<p style="text-align: right;">Page 111</p> <p>1 caseload sizes for the social workers were 2 unmanageable.</p> <p>3 Q. And as part of that -- sorry.</p> <p>4 When did that increased number of social 5 workers occur?</p> <p>6 A. I don't have the exact budget time frame.</p> <p>7 Q. Sure. And was part of the reason that the 8 number of social workers was so low because Child 9 and Family Services had to reduce the number of 10 social workers it had as a result of the economic 11 recession in 2008?</p> <p>12 MS. SACKS: Objection.</p> <p>13 THE WITNESS: I don't know.</p> <p>14 BY MR. MOONEY:</p> <p>15 Q. Was there any explanation provided by the 16 members of Child and Family Services that they were 17 understaffed because of a large reduction in force 18 arising out of the economic conditions of The Great 19 Recession?</p> <p>20 MS. SACKS: Objection.</p> <p>21 THE WITNESS: I don't know.</p> <p>22 BY MR. MOONEY:</p> <p>23 Q. Do you know how many social workers were 24 employed by Child and Family Services before the 25 County Council amended the budget to increase the</p>	<p style="text-align: right;">Page 113</p> <p>1 inmates per year on average that are there every 2 day. It's gone up year over year.</p> <p>3 So you can see correlation, again similar 4 to DCFS, overtime increased costs because of the 5 number of inmates that are there and number of staff 6 you need there, and you can see that number going up 7 over the same time frame of the number of children 8 have gone up for DCFS.</p> <p>9 Q. And does the monthly reports that you're 10 referring to distinguish between inmates that are in 11 custody because of prescription opioid abuse as 12 opposed to some other reason?</p> <p>13 A. No.</p> <p>14 Q. Do you know which -- how -- what 15 percentage of the inmates in custody of the 16 sheriff's department are there as a result of opioid 17 abuse?</p> <p>18 A. I don't know.</p> <p>19 Q. How about of heroin abuse?</p> <p>20 A. I don't know.</p> <p>21 Q. For people who have been arrested for 22 possession of heroin?</p> <p>23 A. I don't know.</p> <p>24 Q. People who have been arrested for 25 possession of prescription opioids?</p>

<p style="text-align: right;">Page 114</p> <p>1 A. I don't know.</p> <p>2 Q. Okay. Is that information that's provided</p> <p>3 to members of County Council --</p> <p>4 MS. SACKS: Objection.</p> <p>5 BY MR. MOONEY:</p> <p>6 Q. -- to your knowledge?</p> <p>7 A. I don't know.</p> <p>8 Q. And when did the sheriff's department</p> <p>9 request additional funding from the County Council</p> <p>10 because of inmate increases in their custody?</p> <p>11 A. It could either be increasing money mainly</p> <p>12 because of overtime or if other departments had to</p> <p>13 go through budget reductions where they could not</p> <p>14 take -- similar to DCFS, where they could not absorb</p> <p>15 a budget reduction.</p> <p>16 So other departments might have gotten</p> <p>17 reduced, not necessarily the sheriff might have seen</p> <p>18 more money, but we were unable to reduce their</p> <p>19 budget because of the issue. And that has happened</p> <p>20 over the same time frame as DCFS. Over the last</p> <p>21 budgets we were unable to do that.</p> <p>22 Q. Sure. So in the fall of 2017, did this</p> <p>23 issue arise of the sheriff having an increased</p> <p>24 number of inmates due to or in their custody?</p> <p>25 MS. SACKS: Objection.</p>	<p style="text-align: right;">Page 116</p> <p>1 we've sort of been using the terminology "additional</p> <p>2 funding," but then you mentioned that the sheriff's</p> <p>3 department may not have seen additional funding. It</p> <p>4 may have actually just seen a level budget while</p> <p>5 other budgets had to be decreased because, in your</p> <p>6 understanding, there's a finite amount of money, and</p> <p>7 the revenue might have been low, and so the</p> <p>8 sheriff's department got to keep everything, but</p> <p>9 other people saw reductions; is that right?</p> <p>10 A. Correct.</p> <p>11 Q. So my question is, when describing the</p> <p>12 Child and Family Services request for funding, were</p> <p>13 they requesting additional funding, or was it a</p> <p>14 request to remain level?</p> <p>15 A. In the social worker example that I said</p> <p>16 where council members provided additional social</p> <p>17 workers, that's something that was done after the</p> <p>18 resolution was introduced.</p> <p>19 Q. Okay. Are there other examples that you</p> <p>20 can think of in the Child and Family Services budget</p> <p>21 where after the OBM resolution was introduced the</p> <p>22 council determined that it would amend the</p> <p>23 resolution to add additional funding to respond to</p> <p>24 the prescription opioid issue in Cuyahoga County?</p> <p>25 A. On top of the social workers, it related</p>
<p style="text-align: right;">Page 115</p> <p>1 THE WITNESS: I don't know.</p> <p>2 BY MR. MOONEY:</p> <p>3 Q. How about in the fall of 2015 during that</p> <p>4 budgeting process, did the sheriff's department</p> <p>5 request funding to respond to the increase in the</p> <p>6 number of inmates in their custody?</p> <p>7 A. I don't know.</p> <p>8 Q. What about in the fall of 2013 during that</p> <p>9 budgeting process, did the sheriff's department</p> <p>10 request additional funding for responding to the</p> <p>11 increase in the number of inmates in their custody?</p> <p>12 A. I don't know.</p> <p>13 Q. And just to make sure that you and I are</p> <p>14 on the same page in how we're describing this of</p> <p>15 increased resources, is it that the executive has</p> <p>16 recommended that the budgets be increased, or is it</p> <p>17 that the Council is considering amending the</p> <p>18 recommended budget to add additional funds on top of</p> <p>19 what the budget -- the recommended budget already</p> <p>20 has in it?</p> <p>21 MS. SACKS: Objection.</p> <p>22 THE WITNESS: What do you mean in terms</p> <p>23 of -- because can you --</p> <p>24 BY MR. MOONEY:</p> <p>25 Q. Yes. I realized while you were talking</p>	<p style="text-align: right;">Page 117</p> <p>1 to originally when one budget was introduced there</p> <p>2 was a belief that over time it could be reduced, so</p> <p>3 that was a budget reduction. During the budget</p> <p>4 hearings, I think they, they collectively, it wasn't</p> <p>5 just Council but Council had to amend the budget,</p> <p>6 but the overtime goals that were in the proposed</p> <p>7 budget wouldn't be met, couldn't be met, the</p> <p>8 reduction. So there had to be an increase there as</p> <p>9 well.</p> <p>10 Q. Okay. When OBM provides the budget to you</p> <p>11 and then it gets to the Council, do you have any</p> <p>12 input in the development of the OBM budget?</p> <p>13 A. You're talking about the biennial budget?</p> <p>14 Q. Yes. Or does it just sort of come to you</p> <p>15 as a finished product that gets the council members</p> <p>16 involved and the process going?</p> <p>17 A. In most cases, prior to introduction there</p> <p>18 are some discussions going back and forth about what</p> <p>19 is going to be introduced.</p> <p>20 Q. And what are those discussions or what do</p> <p>21 those discussions entail?</p> <p>22 A. Particularly focused on if there are</p> <p>23 reductions in departments' budgets, more as an FYI,</p> <p>24 or here is a program that we haven't funded before</p> <p>25 that we would like to fund, a new initiative or</p>

<p style="text-align: right;">Page 118</p> <p>1 program. That would be included in the budget.</p> <p>2 Q. So are these more informational meetings</p> <p>3 so that you know what's coming down the pike for the</p> <p>4 members of Council?</p> <p>5 A. Yes.</p> <p>6 Q. Do you have any role in determining how</p> <p>7 much money the executive's budget will recommend for</p> <p>8 any particular department in the Cuyahoga County</p> <p>9 government?</p> <p>10 A. Not in the recommendation.</p> <p>11 Q. The way you answered that makes me think</p> <p>12 you might play a role in some other part of the</p> <p>13 budgeting process in recommending how much</p> <p>14 departments receive.</p> <p>15 Is that true?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. What role do you play in that</p> <p>18 process?</p> <p>19 A. That would be during the budget amendment</p> <p>20 process where Council, as we talked about, would</p> <p>21 make amendments to the budget.</p> <p>22 Q. Okay. And what is your involvement in</p> <p>23 that process?</p> <p>24 A. I would help assist in creating the budget</p> <p>25 amendments for the council members, working with OBM</p>	<p style="text-align: right;">Page 120</p> <p>1 Is that right?</p> <p>2 A. No.</p> <p>3 Q. No, okay. Where am I wrong about that?</p> <p>4 A. The biennial budget goes to the Committee</p> <p>5 of the Whole, so that is an example.</p> <p>6 Q. And what's the Committee of the Whole?</p> <p>7 A. It's all 11 members that meet. It's not a</p> <p>8 council meeting, so they can't officially approve</p> <p>9 anything or adopt anything out of the Committee of</p> <p>10 the Whole. They still have to refer it out of</p> <p>11 Committee of the Whole to the full council.</p> <p>12 So the biennial process happens during the</p> <p>13 Committee of the Whole process.</p> <p>14 Q. I see. Is there -- who's the chair of the</p> <p>15 Committee of the Whole?</p> <p>16 A. For most Committee of the Wholes it's the</p> <p>17 council president, but for the budget process the</p> <p>18 chair of the finance committee will chair the</p> <p>19 Committee of the Whole.</p> <p>20 Q. Okay. So for the budget processes, at</p> <p>21 least as long as Dale Miller has been the chair of</p> <p>22 the Department of Finance, he has been the chair for</p> <p>23 the budget process, right?</p> <p>24 A. Of the Committee of the Whole, yes.</p> <p>25 Q. Okay. And so who was the chair of the</p>
<p style="text-align: right;">Page 119</p> <p>1 to -- kind of reverse of giving them a heads up that</p> <p>2 this is what Council is going to do during the</p> <p>3 amendment process, during those budget hearings.</p> <p>4 Q. And do you provide recommendations to</p> <p>5 members of Council regarding whether -- whether or</p> <p>6 not a request for funding should or should not be</p> <p>7 approved?</p> <p>8 A. They ask me my opinion.</p> <p>9 Q. Are there particular members of the County</p> <p>10 Council who ask your opinion more frequently than</p> <p>11 others?</p> <p>12 A. On budget amendments?</p> <p>13 Q. On budget amendment issues, yes.</p> <p>14 A. It's a tough question to answer because it</p> <p>15 happens every two years.</p> <p>16 Q. Okay. Are there particular members of</p> <p>17 County Council who are more involved in the budget</p> <p>18 process than others?</p> <p>19 MS. SACKS: Objection.</p> <p>20 THE WITNESS: What do you mean "more</p> <p>21 involved"?</p> <p>22 BY MR. MOONEY:</p> <p>23 Q. So I assume that the department or the</p> <p>24 committee of finance has overall responsibility as a</p> <p>25 committee for the budget.</p>	<p style="text-align: right;">Page 121</p> <p>1 finance department or finance division -- finance</p> <p>2 committee of the County Council before Council</p> <p>3 Member Miller?</p> <p>4 A. What time frame?</p> <p>5 Q. Just before.</p> <p>6 A. Immediately before?</p> <p>7 Q. Sure.</p> <p>8 A. Dave Greenspan.</p> <p>9 Q. And before Mr. Greenspan?</p> <p>10 A. Dale Miller.</p> <p>11 Q. Okay. So it went Miller, Greenspan,</p> <p>12 Miller?</p> <p>13 A. Miller back, yes.</p> <p>14 Q. Before Miller, was there a different</p> <p>15 chair?</p> <p>16 A. He was the first chair of the finance</p> <p>17 committee.</p> <p>18 Q. I see. And have you provided a</p> <p>19 recommendation to members of the County Council</p> <p>20 regarding whether additional funding should be</p> <p>21 provided to address Cuyahoga's opioid addiction</p> <p>22 issues?</p> <p>23 A. I discussed with the council members the</p> <p>24 request for additional social workers, the restoring</p> <p>25 of the funds for the overtime.</p>

<p style="text-align: right;">Page 122</p> <p>1 Q. Anything else?</p> <p>2 A. I've discussed that -- the inability to</p> <p>3 reduce the sheriff's budget because of the overtime</p> <p>4 issue.</p> <p>5 Q. Anything else?</p> <p>6 A. I've discussed the -- we haven't talked</p> <p>7 about the funding provided for first responders for</p> <p>8 the naloxone, I believe.</p> <p>9 Q. Is that -- is that first responders</p> <p>10 related to MetroHealth funding?</p> <p>11 A. Part of -- they were involved in the</p> <p>12 project, but we also wanted to make available to</p> <p>13 various cities and stuff some funding through -- we</p> <p>14 have public safety grants that that money could be</p> <p>15 used for that purpose.</p> <p>16 Q. I see.</p> <p>17 A. In addition, we discussed -- we increased</p> <p>18 the ADAMHS Board subsidy.</p> <p>19 Q. You -- the ADAMHS Board is funded by the</p> <p>20 Health and Human Services levy, right?</p> <p>21 A. Partially funded by the Health and Human</p> <p>22 Services levy.</p> <p>23 Q. What other part is the ADAMHS Board</p> <p>24 funded?</p> <p>25 A. They get money that directly. They get</p>	<p style="text-align: right;">Page 124</p> <p>1 in body transportation costs related to the opioid</p> <p>2 issues in Cuyahoga County; is that right?</p> <p>3 A. Yes.</p> <p>4 Q. Did that request come in the fall of 2017</p> <p>5 as part of the budget process?</p> <p>6 A. It came -- that particular request came as</p> <p>7 a contract amendment to the Board of Control.</p> <p>8 Q. I see. And when did it come before the</p> <p>9 Board of Control as a contract amendment?</p> <p>10 A. I don't have the exact date.</p> <p>11 Q. Was it within the last four years?</p> <p>12 A. I can't say for certain.</p> <p>13 Q. For the MetroHealth request for funding,</p> <p>14 is it your understanding that Cuyahoga County</p> <p>15 provides funding to operate the Project DAWN</p> <p>16 program?</p> <p>17 A. Partially, it's my understanding.</p> <p>18 Q. And do you know when the Project DAWN --</p> <p>19 when Project DAWN began in Cuyahoga County?</p> <p>20 A. I do not.</p> <p>21 Q. Does March of 2013 sound right for when</p> <p>22 Project DAWN began?</p> <p>23 A. I don't know.</p> <p>24 Q. And Project DAWN is the naloxone program?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 123</p> <p>1 money from the State of Ohio. I don't know the</p> <p>2 particulars.</p> <p>3 Q. Okay. So as far as Cuyahoga County's</p> <p>4 funding of the ADAMHS Board is concerned, it's</p> <p>5 coming from the HHS levy?</p> <p>6 A. Yes. There is I would say an asterisk to</p> <p>7 that though. I believe the Court of Common Pleas</p> <p>8 has contracts with the ADAMHS Board. They might</p> <p>9 not -- that portion of that contract might not be</p> <p>10 funded from the Health and Human Services levy, but</p> <p>11 those are small amounts compared to the full</p> <p>12 subsidy.</p> <p>13 Q. Okay. And the HHS levy is -- that's a tax</p> <p>14 on Cuyahoga County properties; is that right?</p> <p>15 A. Yes.</p> <p>16 Q. And that HHS levy is approved by the</p> <p>17 citizens of the county as a part of a ballot</p> <p>18 process?</p> <p>19 A. Ballot initiative.</p> <p>20 Q. And does the -- does the HHS levy only</p> <p>21 fund the ADAMHS Board, or does it fund other things</p> <p>22 as well?</p> <p>23 A. It funds other things as well.</p> <p>24 Q. You mentioned the Medical Examiner's</p> <p>25 Office also requested funding because of an increase</p>	<p style="text-align: right;">Page 125</p> <p>1 Q. Makes naloxone available to people who</p> <p>2 have overdosed from prescription opioids or heroin?</p> <p>3 A. That's my understanding of Project DAWN.</p> <p>4 Q. Other than the Child and Family Services,</p> <p>5 sheriff department, medical examiner, MetroHealth</p> <p>6 and ADAMHS Board, are there any other departments of</p> <p>7 the government that have come before the County</p> <p>8 Council and requested funding to respond to the</p> <p>9 opioid crisis in Cuyahoga County?</p> <p>10 A. Not that I can remember at this time.</p> <p>11 Q. Okay. When you became the legislative</p> <p>12 budget adviser, were you required to take any sort</p> <p>13 of oath?</p> <p>14 A. No.</p> <p>15 Q. Okay. You're not like a member of</p> <p>16 Congress where you have to swear to uphold the laws</p> <p>17 of the Constitution?</p> <p>18 A. Some department directors at the County</p> <p>19 have to do that.</p> <p>20 Q. Okay. But you're not one of them --</p> <p>21 A. No.</p> <p>22 Q. -- as a staff member of the Council?</p> <p>23 A. As a staff member of Council.</p> <p>24 Q. Do you consider yourself to have any</p> <p>25 duties to the residents of Cuyahoga County as a</p>

<p>1 legislative budget adviser?</p> <p>2 MS. SACKS: Objection.</p> <p>3 THE WITNESS: Can you describe a little</p> <p>4 further what you mean by that?</p> <p>5 BY MR. MOONEY:</p> <p>6 Q. Sure. Do you consider it your</p> <p>7 responsibility to ensure that funds are allocated</p> <p>8 responsibly among the various parts of the Cuyahoga</p> <p>9 County government?</p> <p>10 MS. SACKS: Objection.</p> <p>11 THE WITNESS: I think as a public servant,</p> <p>12 someone who is funded from the taxpayer money, yes.</p> <p>13 BY MR. MOONEY:</p> <p>14 Q. Okay. And does your -- do you consider</p> <p>15 your role as the legislative budget adviser as also</p> <p>16 including a responsibility that County Council has</p> <p>17 accurate information regarding the budgets that it</p> <p>18 ultimately passes into law?</p> <p>19 A. Yes. I believe that is one of my main</p> <p>20 responsibilities, to ensure council members are</p> <p>21 informed accurately.</p> <p>22 Q. And do you consider your responsibility as</p> <p>23 a legislative budget adviser to understand the</p> <p>24 County's overall economic outlook in order to inform</p> <p>25 council members of the budgeting process?</p>	Page 126	<p>1 collections, right?</p> <p>2 A. Yes.</p> <p>3 Q. My understanding is that the property</p> <p>4 taxes are collected by the state, right?</p> <p>5 A. No.</p> <p>6 Q. No, okay. How am I wrong?</p> <p>7 A. The property tax -- the property taxes is</p> <p>8 collected directly from the County.</p> <p>9 Q. Okay.</p> <p>10 A. So residents will send money directly to</p> <p>11 the County.</p> <p>12 Q. Okay. And as a legislative budget</p> <p>13 adviser, do you watch for trends or -- I'm</p> <p>14 forgetting the words you used to describe it, but</p> <p>15 basically events that you think should be raised</p> <p>16 with the members of the Council regarding the</p> <p>17 County's property tax collection?</p> <p>18 A. I -- yes, I keep that on my radar.</p> <p>19 Q. And is it your understanding or do you</p> <p>20 have an understanding of whether property values in</p> <p>21 Cuyahoga County declined as part of the assessment</p> <p>22 process in 2011?</p> <p>23 A. I can't speak to the reappraisal process</p> <p>24 in 2011.</p> <p>25 Q. Okay. Do you -- does anyone report to you</p>	Page 128
<p>1 MS. SACKS: Objection.</p> <p>2 THE WITNESS: Can you rephrase that,</p> <p>3 please?</p> <p>4 BY MR. MOONEY:</p> <p>5 Q. So you mentioned earlier that one of the</p> <p>6 things that you keep an eye on is the sales tax</p> <p>7 collections.</p> <p>8 Is it your -- do you believe it's one of</p> <p>9 your responsibilities to understand the sort of</p> <p>10 external economic factors that impact the revenue</p> <p>11 that is available to the County's government?</p> <p>12 MS. SACKS: Objection.</p> <p>13 THE WITNESS: I don't believe it is my</p> <p>14 direct responsibility. We defer to OBM for that</p> <p>15 information, but I like to have a knowledge of like,</p> <p>16 example, the sales tax.</p> <p>17 BY MR. MOONEY:</p> <p>18 Q. Do you keep an eye on the property tax</p> <p>19 collections that are -- that go into the County's</p> <p>20 revenue stream?</p> <p>21 MS. SACKS: Objection.</p> <p>22 THE WITNESS: What do you mean "keep an</p> <p>23 eye on"?</p> <p>24 BY MR. MOONEY:</p> <p>25 Q. So you follow trends in sales tax</p>	Page 127	<p>1 as the legislative budget adviser? Do you have a</p> <p>2 staff?</p> <p>3 A. I do not have a staff --</p> <p>4 Q. Do you --</p> <p>5 A. -- that directly report to me.</p> <p>6 Q. Okay. Do you report to -- do you report</p> <p>7 to someone?</p> <p>8 A. I report directly to our chief of staff,</p> <p>9 Joseph Nanni, but the staff do work for all 11</p> <p>10 council members. But we all directly report to our</p> <p>11 chief of staff, Joe Nanni.</p> <p>12 Q. And what are Mr. Nanni's duties, as you</p> <p>13 understand them?</p> <p>14 A. He's the chief of staff, so I kind of will</p> <p>15 leave it there. I mean, he's just -- he's</p> <p>16 responsible for the staff, ensuring staff is meeting</p> <p>17 the, you know, requests and needs of the council</p> <p>18 members and things of that nature.</p> <p>19 Q. Okay. What is the -- and then what is the</p> <p>20 role of the clerk of council, as you understand it?</p> <p>21 A. The clerk of council, she has two staff</p> <p>22 members, so there's a total of three clerks. They</p> <p>23 are there to manage the agenda, the minutes, the</p> <p>24 records for all the committee members -- I'm sorry,</p> <p>25 committees, not committee members, but the council</p>	Page 129